

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

AMCOR

CERTIFICATE
NUMBER

15

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

23 MAY 2019

DATE OF EXPIRY

22 MAY 2022

CERTIFIED SINCE

23 MAY 2019

AUTHORISED BY

A handwritten signature in white ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard*

CERTIFICATION SCOPE

Amcor Flexibles Sarrebourg SAS, Amcor Flexible
Packaging France SAS, site de Froges, Amcor
Flexibles Teningen Tscheulin-Rothal GmbH,
Amcor Flexibles Rorschach AG and Amcor
Flexibles Singen GmbH

SUMMARY AUDIT REPORT CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Amcor
ENTITY NAME	Amcor Flexibles
CERTIFICATION SCOPE	<ul style="list-style-type: none">• Amcor Flexibles Sarrebourg SAS.• Amcor Flexible Packaging France SAS, site de Froges• Amcor Flexibles Teningen Tscheulin-Rothal GmbH• Amcor Flexibles Rorschach AG• Amcor Flexibles Singen GmbH
SUPPLY CHAIN ACTIVITIES	Post-Casthouse
ASI STANDARD	Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit (28 September 2019, 29 October 2018, 2 April 2019)• Scope Change Audit (11 – 27 June 2019)
AUDIT FIRM	DNV GL
AUDIT DATE	<ul style="list-style-type: none">• 28 September 2018, 29 October 2018, 2 April 2019 (Certification Audit and follow-up desktop audit)• 11 – 27 June 2019 (Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 18 December 2018 (Initial Certification Audit Report), re-submitted 13 May 2019 (follow-up desktop audit)• 11 November 2019 (Scope Change Audit Report)
AUDIT SCOPE	<p><u>Initial Certification Audit:</u></p> <p>The audit scope covered the Amcor Flexibles Singen site (Germany) and CoC activities managed at the Amcor Flexibles head office (Zurich, Switzerland).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Post-Casthouse

Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

Scope Change Audit (11 – 27 June 2019):

The audit scope covered:

- Amcor Flexibles Sarrebourg SAS.
- Amcor Flexible Packaging France SAS, site de Froges
- Amcor Flexibles Teningen Tscheulin-Rothal GmbH
- Amcor Flexibles Rorschach AG
- Amcor Flexibles Singen GmbH

Supply chain activities included in the audit scope:

- Post-Casthouse

Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

AUDIT
OUTCOME

Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

23 May 2019 – 22 May 2022

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

20 November 2020

CERTIFICATION
NUMBER

15

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Amcor Limited (parent company of the 5 Amcor Entities assessed here) is an active ASI member. https://aluminium-stewardship.org/about-asi/asi-members/amcor/
1.2 Management system	Conformance	Amcor established policies, systems, procedures and processes that comply with ASI CoC criteria regarding a management system. The management system we observed has the capacity to handle ASI CoC material. The existing procedure describes the sites' management systems in detail, responsibilities, functions, processes and workflows, documentation and record retention and handling of non-conforming product deliveries. Amcor sites in scope of this certification have integrated management systems underpinned by ISO 9001. The in-scope sites' ISO 9001 certificates are valid for the certification period.
1.3 Management system reviews	Conformance	Amcor has established mechanisms for the periodic review of the Management System, in line with sites' ISO 9001 certifications.
1.4 Management representative	Conformance	Each Amcor site in scope has nominated a management representative to have overall responsibility of the implementation of ASI CoC and authority for the site's conformance with all applicable requirements of the CoC Standard.
1.5 Training	Conformance	Amcor sites have communicated and delivered training to relevant personnel to raise awareness of ASI CoC requirements. Amcor sites have further plans to implement training measures that will make relevant personnel aware of and competent in their responsibilities under the CoC Standard.
1.6 Record keeping	Conformance	Amcor sites maintain up to date records covering all applicable requirements of the CoC Standard and retain them for a minimum of five years.
1.7a Reporting to ASI (Inputs and Outputs)	Not Applicable	Not applicable for first Certification Audit, however Amcor Teningen, Sarrebourg and Froges have adequately demonstrated that they have SAP-based material accounting systems in place and Chain of Custody controls already.
1.7b Reporting to ASI (Input Percentage)	Not Applicable	Not applicable for first Certification Audit.

CRITERION	RATING	COMMENT
1.7c Reporting to ASI (Positive Balance)	Not Applicable	Not applicable for first Certification Audit.
1.7d Reporting to ASI (Internal Overdraw)	Not Applicable	Not applicable for first Certification Audit.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	Not applicable for first Certification Audit.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	Not applicable for first Certification Audit.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	Not applicable for first Certification Audit.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	Not applicable as Amcor sites will not use any outsourcing contractor. Amcor Singen and Sarrebourg use third party contractors for activities such as warehousing and slitting however as per ASI CoC Guidance, this is outside of the certification scope.
2.2a Control of CoC Material	Not Applicable	Not applicable as Amcor sites will not use any outsourcing contractor. Amcor Singen and Sarrebourg use third party contractors for activities such as warehousing and slitting however as per ASI CoC Guidance, this is outside of the certification scope.
2.2b No further outsourcing	Not Applicable	Not applicable as Amcor sites will not use any outsourcing contractor. Amcor Singen and Sarrebourg use third party contractors for activities such as warehousing and slitting however as per ASI CoC Guidance, this is outside of the certification scope.
2.2c Risk assessment	Not Applicable	Not applicable as Amcor sites will not use any outsourcing contractor. Amcor Singen and Sarrebourg use third party contractors for activities such as warehousing and slitting however as per ASI CoC Guidance, this is outside of the certification scope.
2.3 Output Quantity	Not Applicable	Not applicable as Amcor sites will not use any outsourcing contractor. Amcor Singen and Sarrebourg use third party contractors for activities such as warehousing and slitting however as per ASI CoC Guidance, this is outside of the certification scope.

CRITERION	RATING	COMMENT
2.4 Verification and record-keeping	Not Applicable	Not applicable as Amcor sites will not use any outsourcing contractor. Amcor Singen and Sarrebourg use third party contractors for activities such as warehousing and slitting however as per ASI CoC Guidance, this is outside of the certification scope.
2.5 Error management	Not Applicable	Not applicable as Amcor sites will not use any outsourcing contractor. Amcor Singen and Sarrebourg use third party contractors for activities such as warehousing and slitting however as per ASI CoC Guidance, this is outside of the certification scope.

3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL

3.1a CoC Certification Scope – Bauxite Mining	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.1b ASI Performance Standard – Bauxite Mining	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.2a CoC Certification Scope – Alumina Refining	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.2b ASI Performance Standard – Alumina Refining	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.3a CoC Certification Scope – Aluminium Smelting	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.3b ASI Performance Standard – Aluminium Smelting	Not Applicable	This criterion is not applicable to the Entity's certification scope.

4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL

4.1a CoC Certification Scope – Aluminium Re-Melting/Refining	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.2a Pre-Consumer Scrap and Dross	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.2b Post-Consumer Scrap	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.3a Supplier records	Not Applicable	This criterion is not applicable to the Entity's certification scope.

CRITERION	RATING	COMMENT
4.3b Cash payments	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope – Casthouses	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.1b ASI Performance Standard – Casthouses	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.2 Casthouse Products	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Conformance	Amcor controls all in-scope sites for this CoC certification. The sites' operating procedures and strategic plans with future ASI certified suppliers will secure the supply and production of ASI CoC materials. Amcor's key focus is on responsible sourcing and encouraging its suppliers to provide ASI certified material. Amcor demonstrates leadership initiatives, drives capacity-building efforts in key supply chains and has helped a number of Value Chain Partners from bauxite mine to semi-fabrication to get ready for the new ASI Standard. Press release can be found below: https://packagingeurope.com/sig-and-amcor-push-responsible-aluminium-sourcing-further/
6.1b ASI Performance Standard – Post-Casthouse	Conformance	Amcor sites in scope have achieved certification to the ASI Performance Standard.
6.1c Sourcing ASI Aluminium	Conformance	Amcor's operating procedures and material accounting system ensures that the Entity only sources CoC materials from another CoC certified entity via traceable CoC documents. Internal controls are established to manage CoC documents via the outsourced warehouse company and training is provided to relevant personnel. During the site tour, we verified the process for checking incoming raw materials from the outsourced warehouse which is robust to ensure CoC documents are in compliance with the Standard's requirements.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	Amcor developed a Supplier Code of Conduct covering the ASI CoC criteria of anti-corruption. A copy of the Suppliers Code of Conduct can be found on the company's website:

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		https://assets.ctfassets.net/f7tuyt85vtoa/6vKfxsmeRisoQumUWlsEQw/09eac164d42103e24abb101c431c9037/Amcor-Supplier-Code-of-Conduct.pdf
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	Amcor has established a Supplier Code of Conduct, which includes the ASI CoC's criteria for responsible sourcing policy and has initiatives in place to ensure the policy is implemented. For instance, Amcor is undertaking EcoVadis risk assessment of key strategic suppliers. It is also conducting second party audits covering sustainability indicators.
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	Amcor's Supplier Code of Conduct addresses human rights elements, such as non-discrimination, child labour, forced labour and freedom from harassment as they relate to international labour standards. Supplier Code of Conduct is available below: https://assets.ctfassets.net/f7tuyt85vtoa/6vKfxsmeRisoQumUWlsEQw/09eac164d42103e24abb101c431c9037/Amcor-Supplier-Code-of-Conduct.pdf Furthermore, Amcor also undertakes a regular EcoVadis supplier risk assessments and implemented appropriate mitigation measures.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	Amcor has undertaken an EcoVadis supplier risk assessment, which considers risk profiles of countries based on risk criteria, which includes Health, Social, Corruption, Human rights and Environment indicators. Conflict affected and high risk areas are included in the assessment criteria above. Amcor implemented mitigation measures adequate to the risk ratings. 70% of Amcor's most important (strategic and critical) suppliers have been assessed which equals to 85% of Amcor's global procurement spend.
7.2 Risk assessment	Conformance	Amcor undertakes EcoVadis risk assessments of all its strategic, critical and core suppliers and completes risk mitigation efforts where relevant. Procurement colleagues are trained on how to use the EcoVadis assessment in their purchasing decisions and managing supplier relationships. Amcor also conducts second party audits of its supply chain. Amcor in cooperation with SIG Combibloc are leading efforts to increase the responsible sourcing of aluminium. Further information can be found via the link below: https://www.sig.biz/en/media/pressreleases/sig-and-amcor-push-responsiblealuminium-sourcing-further

CRITERION	RATING	COMMENT
7.3 Complaints mechanism	Conformance	Amcor's Whistleblower Policy and independent Whistleblower Service enables employees and external stakeholders to report anonymously potential modern slavery related concerns and other breaches of the Code of Conduct and Ethics Policy or Supplier Code of Conduct. Please find below link to access Amcor's Whistleblower Policy: https://assets.ctfassets.net/f7tuyt85vtoa/A7acCXyI3Qyg8eY4gaS6Q/7785b3379dbc17d9d6d1ce36e4406363/Whistleblower_Policy_and_Charter_-_April_2018_-_English.pdf
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	Each in-scope Amcor Entity operates its own Material Accounting System that records Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass. The Material Accounting Systems are based on Mass Balance at each in-scope Amcor Entity.
8.2a Post-Consumer Scrap	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.2b Pre-Consumer Scrap (total)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.3 Material Accounting Period	Conformance	Amcor sites' Material Accounting Systems specify a Material Accounting Period, which is aligned to Amcor's financial year 1st July - 30th June.
8.4 Input Percentage	Conformance	In-scope entities calculate and record the Input Percentage for a given Material Accounting Period using the required formula, as per ASI guidelines. It must be noted that, at the time of the audit, there were no examples of effective implementation of the system as there has been no sourcing and transfer of CoC Material.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.6 Output Quantity determination	Conformance	In-scope Entities use the Input Percentage for the given Material Accounting Period to determine the Output Quantity of CoC Material, by mass. However, the effectiveness of this calculation could not be checked as there has been no sourcing and transfer of CoC Material.

CRITERION	RATING	COMMENT
8.7 Output Quantity designation	Conformance	In-scope Entities have demonstrated that the Output Quantity of CoC Material, which may be a subset of total production, will be designated as 100% CoC Material. At the time of the audit, there was no example of effective implementation of the system as there has been no sourcing and transfer of CoC Material.
8.8 Output Quantity – Pre-Consumer Scrap	Not Applicable	At present, Amcor sites do not intend to determine waste material as ASI pre-consumer scrap.
8.9 Outputs not exceed inputs	Conformance	In-scope Entities' Material Accounting Systems ensure that the total output of CoC Material and/or Eligible Scrap does not proportionally exceed the Input Percentage as applied to total input of CoC Material and/or Eligible Scrap over the Material Accounting Period. As there has been no sourcing and transfer of CoC Material, the effectiveness of those systems will be assessed at the next surveillance audit.
8.10a Internal Overdraws (not exceed 20%)	Conformance	Where CoC Material is under contract for delivery to an Entity within a given Material Accounting Period, but is subject to a force majeure situation, Amcor sites' Material Accounting System may carry over an Internal Overdraw to the subsequent Material Accounting Period. The Internal Overdraw shall not exceed 20% of total Input Quantity of CoC Material for the Material Accounting Period, Amcor sites have demonstrated awareness of this rule. As there has been no sourcing and transfer of CoC Material yet, the effectiveness of these documents and records will be assessed at the next surveillance audit.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	Where CoC Material is under contract for delivery to an Entity within a given Material Accounting Period, but is subject to a force majeure situation, Amcor sites' Material Accounting Systems may carry over an Internal Overdraw to the subsequent Material Accounting Period. The Internal Overdraw shall not exceed the amount of CoC Material affected by the force majeure situation. Amcor sites have demonstrated awareness of this rule. As there has been no sourcing and transfer of CoC Material yet, the effectiveness of these documents and records will be assessed at the next surveillance audit.
8.10c Internal Overdraws (period to make up)	Conformance	Where CoC Material is under contract for delivery to an Entity within a given Material Accounting Period, but is subject to a force majeure situation, Amcor sites' Material Accounting Systems may carry over

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		<p>an Internal Overdraw to the subsequent Material Accounting Period. The Internal Overdraw shall be made up within the subsequent Material Accounting Period. Amcor sites have demonstrated awareness of this rule. As there has been no sourcing and transfer of CoC Material yet, the effectiveness of these documents and records will be assessed at the next surveillance audit.</p>
8.11a Positive Balance (carry over)	Conformance	<p>Each in-scope Amcor Entity operates its own Material Accounting System. Where an Amcor Entity has a Positive Balance of output CoC Material at the end of a Material Accounting Period, there are plans in place to carry this over to the subsequent Material Accounting Period. The Entity's Material Accounting System must clearly identify any carry over of a Positive Balance. Amcor sites have demonstrated awareness of this rule. As there has been no sourcing and transfer of CoC Material yet, the effectiveness of these documents and records will be assessed at the next surveillance audit.</p>
8.11b Positive Balance (expiry)	Conformance	<p>Where an Amcor site has a Positive Balance of output CoC Material at the end of a Material Accounting Period, there are plans in place to carry this over to the subsequent Material Accounting Period, and for the positive balance to expire at the end of that Period if not drawn down. However, as there has been no sourcing and transfer of CoC Material yet, the effectiveness of these documents and records will be assessed at the next surveillance audit.</p>
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	<p>Amcor sites have systems that can produce shipment and transfer of CoC documents, ensuring that these are controlled, issued and stored as per ASI Chain of Custody Standard requirements. However, as there has been no sourcing and transfer of CoC Material yet, the effectiveness of these documents and records will be assessed at the next surveillance audit.</p>
9.2a Date of issue	Conformance	<p>Amcor will issue the following information on invoice documents as required by ASI Chain of Custody Standard: date of issue, reference number, issuing entity, receiving customer, responsible employee, conformance statement, type and mass of CoC material, mass of total material and sustainability data. However, as there has been no sourcing and</p>

CRITERION	RATING	COMMENT
		transfer of CoC Material yet, the effectiveness of these documents and records will be assessed at the next surveillance audit.
9.2b Reference number	Conformance	Amcor will issue the following information on invoice documents as required by ASI Chain of Custody Standard: date of issue, reference number, issuing entity, receiving customer, responsible employee, conformance statement, type and mass of CoC material, mass of total material and sustainability data. However, as there has been no sourcing and transfer of CoC Material yet, the effectiveness of these documents and records will be assessed at the next surveillance audit.
9.2c Issuing Entity	Conformance	Amcor will issue the following information on invoice documents as required by ASI Chain of Custody Standard: date of issue, reference number, issuing entity, receiving customer, responsible employee, conformance statement, type and mass of CoC material, mass of total material and sustainability data. However, as there has been no sourcing and transfer of CoC Material yet, the effectiveness of these documents and records will be assessed at the next surveillance audit.
9.2d Receiving customer	Conformance	Amcor will issue the following information on invoice documents as required by ASI Chain of Custody Standard: date of issue, reference number, issuing entity, receiving customer, responsible employee, conformance statement, type and mass of CoC material, mass of total material and sustainability data. However, as there has been no sourcing and transfer of CoC Material yet, the effectiveness of these documents and records will be assessed at the next surveillance audit.
9.2e Responsible employee	Conformance	Amcor will issue the following information on invoice documents as required by ASI Chain of Custody Standard: date of issue, reference number, issuing entity, receiving customer, responsible employee, conformance statement, type and mass of CoC material, mass of total material and sustainability data. However, as there has been no sourcing and transfer of CoC Material yet, the effectiveness of these documents and records will be assessed at the next surveillance audit.
9.2f Conformance statement	Conformance	Amcor will issue the following information on invoice documents as required by ASI Chain of Custody Standard: date of issue, reference number, issuing

CRITERION	RATING	COMMENT
		entity, receiving customer, responsible employee, conformance statement, type and mass of CoC material, mass of total material and sustainability data. However, as there has been no sourcing and transfer of CoC Material yet, the effectiveness of these documents and records will be assessed at the next surveillance audit.
9.2g Type of CoC Material	Conformance	Amcor Singen will issue information on invoice documents as required by ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9.2h Mass of CoC Material	Conformance	Amcor Singen will issue information on invoice documents as required by ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9.2i Mass of total material	Conformance	Amcor Singen will issue information on invoice documents as required by ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9.3a Sustainability Data (optional)	Not Applicable	Individual Amcor sites are not planning on filling out the sustainability data about CoC Material on the CoC Documents.
9.3b Sustainability Data (passing on)	Not Applicable	Individual Amcor sites are not planning on filling out the sustainability data about CoC Material on the CoC Documents.
9.3c Post-Casthouse ASI Certification status	Conformance	ASI Certification information will be part of the CoC Documents. All Amcor sites in scope have carried out an ASI Performance Standard audit. As there has been no sourcing and transfer of CoC Material, the effectiveness of these documents and records will be assessed at the next surveillance audit.
9.4 Supplementary Information (optional)	Not Applicable	Amcor sites do not intend to include supplementary information on the CoC Documents.
9.5 Response to verification requests	Conformance	Customer service teams will be responsible for handling the CoC requests from customers at all individual Amcor sites in scope. Customer service team received training on their duties. Furthermore, Amcor integrated error management with its current processes under ISO 9001. We observed the operation of its Knowledge Management System,

CRITERION	RATING	COMMENT
		which was robust to document errors, corrective actions and any potential preventive measures to meet ASI Chain of Custody criteria.
9.6 Error management	Conformance	Amcor's Knowledge Management System, KMS handles errors related to ASI CoC Materials. Amcor implemented processes to inform different stakeholders, such as clients or suppliers, on the non-conformity or error and agree on necessary corrective actions.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	We observed Amcor's capacity at the site which enables them to meet CoC criteria. SAP system is used to handle incoming materials, and training has been given to relevant personnel on how to verify received CoC documents. As there has been no sourcing and transfer of CoC Materials at the time of the audit, the effectiveness of these procedures will be checked at the next surveillance audit.
10.2 Verify consistency with shipments	Conformance	Amcor established processes to ensure that CoC documents are controlled, issued and stored as per ASI CoC requirements. As there has been no sourcing and transfer of CoC Materials at the time of the audit, the effectiveness of these procedures will be checked at the next surveillance audit.
10.3 Verify supplier CoC Certification status	Conformance	Amcor established robust processes to ensure suppliers have a valid ASI certificate and trigger adequate processes if any changes occur to their status. The process will be managed by central procurement function.
10.4 Error management	Conformance	Amcor integrated error management with its current processes under ISO 9001. We observed the operation of its Knowledge Management System, which was robust to document errors, corrective actions and any potential preventive measures to meet ASI Chain of Custody criteria.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.1b Link to Casthouse Products	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.1c No double counting	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.

CRITERION	RATING	COMMENT
11.1d No Positive Balance for ASI Credits	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.2a Date of issue	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.2b Reference number	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.2c Issuing Entity	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.2d Receiving Entity	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.2e Conformance statement	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.2f ASI Credits statement	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.2g Quantity	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.3b Material Accounting System – purchasing	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.3c Expiry	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.3d No re-trading	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.3e No allocation to physical products	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.3f Verify supplier CoC Certification status	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Not applicable as Amcor does not intend to utilise the ASI market credits system.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	Amcor appointed roles and responsibilities to ensure that claims are made in a manner consistent with the ASI Claims Guide. At the time of the audit, there were no examples of effective implementation of the system there has been no sourcing and transfer of CoC Material.

CRITERION	RATING	COMMENT
12.1b Verifiable evidence	Conformance	Amcor appointed roles and responsibilities to ensure that claims are made in a manner consistent with the ASI Claims Guide. At the time of the audit, there were no examples of effective implementation of the system there has been no sourcing and transfer of CoC Material.
12.1c Employee training	Conformance	The Head of Sustainability at Amcor takes ownership of claims and/or representations outside of CoC Documents. He is aware of his duties under the Standard and will approve external communication related to the ASI Chain of Custody Standard.

Document Control and Version History

Revision	Date	Notes
0	23 May 2019	Issued
1	11 December 2019	Updated to reflect Certification Scope change with addition of Amcor Flexibles Sarrebourg SAS, Amcor Flexible Packaging France SAS, site de Froges, Amcor Flexibles Teningen Tscheulin-Rothal GmbH and Amcor Flexibles Rorschach AG